

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

Joint Motion to Modify Case Management Order

The parties jointly move this Court to modify the Case Management Order, ECF No. 81, to extend by 30 days the deadline to complete discovery that has been served and the corresponding deadline for motions to compel. In support, they state:

1. Discovery in this case must be complete by April 29, 2019. ECF No. 81. Motions to compel must be filed no later than seven days after the discovery deadline. *Id.*
2. Certain discovery has been served that the parties are working diligently to complete but that nonetheless will not be completed by April 29. In particular, Plaintiffs served their second request for production on January 29 and the parties continue to work to facilitate production in light of technological limitations. Moreover, in mid-March Plaintiffs served subpoenas to produce documents upon the custodian of records for the Office of the Governor, the Missouri Highway Patrol, and St. Louis County, and, although those entities have not yet provided responsive documents, they have agreed to do so on a timetable that will extend past April 29. Finally, Defendants have served deposition subpoenas on Keith Rose, Alicia Street, and Scott Kampas, but, because of

scheduling conflicts with the deponents and their attorneys, cannot complete the depositions by April 29.

3. The parties ask to extend the deadline for completing discovery by 30 days, through May 29, and the corresponding deadline for motions to compel through June 5.
4. The proposed extension would not require changes to any of the other deadlines in the Case Management Order.

WHEREFORE the parties move this Court to modify the Case Management Order to extend through May 29, 2019 the deadline to complete discovery that is served prior to April 29 and to extend through June 5 the deadline for motions to compel.

Respectfully submitted,

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